

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<p>WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>ZTE CORPORATION, ZTE (USA) INC., AND ZTE (TX), INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 6:20-cv-00487-ADA Case No. 6:20-cv-00488-ADA Case No. 6:20-cv-00489-ADA Case No. 6:20-cv-00490-ADA Case No. 6:20-cv-00491-ADA Case No. 6:20-cv-00492-ADA Case No. 6:20-cv-00492-ADA Case No. 6:20-cv-00493-ADA Case No. 6:20-cv-00494-ADA Case No. 6:20-cv-00496-ADA Case No. 6:20-cv-00497-ADA</p> <p style="text-align: center;"><b>JURY TRIAL DEMANDED</b></p>
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**JOINT CASE READINESS STATUS REPORT**

**TO THE HONORABLE COURT:**

Plaintiff WSOU Investments, LLC and Defendants ZTE Corporation, ZTE (USA) Inc, and ZTE (TX) Inc. hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff WSOU filed 11 complaints in the above-numbered cases on June 3, 2020. Through extension, Defendants filed Motions to Dismiss or Transfer on October 9, 2020. Through extensions, Plaintiff's deadline to respond the Motions to Dismiss is November 9, 2020.

**RESPONSES TO THE COMPLAINTS**

Defendants filed Motions to Dismiss or Alternatively Transfer all of the cases on October 9, 2020.

### **PENDING MOTIONS**

Each Defendant filed Motions to Dismiss or Alternatively Transfer in each of the 11 cases challenging the venue as improper. There are no other pending motions. With the granted extensions, Plaintiff has until November 9 to respond.

### **RELATED CASES IN THIS JUDICIAL DISTRICT**

The above-numbered cases were all filed by Plaintiff against Defendants in this District. There are no known related cases.

### **IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

### **NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has asserted one patent in each of the above 11 suits; Plaintiff has not yet disclosed its asserted claims. Plaintiff will timely serve its infringement contentions including the asserted claims pursuant to any order set forth in the Order Governing Proceedings.

### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties believe appointment of a technical adviser would be beneficial due to the highly technical aspects of these cases.

### **MEET AND CONFER STATUS**

The parties raise the following pre-*Markman* issues:

***Conduct of Markman Hearing*** – the parties understand that the Court has scheduled these cases for *Markman* on May 20-21, 2021. The parties are meeting and conferring and will make a proposal to the Court for orderly presentation of the claim construction issues presented in the above-numbered cases over the two days allocated for hearing.

***Protective Order*** – the parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming days.

Date: October 20, 2020

Respectfully submitted,

By: /s/ James L. Etheridge

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